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**From:** Kittinger, Eric [Eric.Kittinger@meritenergy.com]  
**Sent:** 5/31/2022 8:09:05 PM  
**To:** Wiser, Nathan [Wiser.Nathan@epa.gov]  
**Subject:** RE: Circle Ridge Injection Well P&As

Nathan,

Thanks. I will get the engineer working on the revised plans and will submit them directly to you.

Also, once the wells have been plugged and I am submitting the EPA form, do you also want a copy of the daily reports and a wellbore diagram? Do I send these to you via email or hard copy?

Eric Kittinger  
Senior Regulatory Analyst  
Merit Energy Company  
13727 Noel Road, Ste 1200  
Dallas, TX 75240  
972-628-1441 (Office)  
512-554-8093 (Mobile)

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**From:** Wiser, Nathan <Wiser.Nathan@epa.gov>  
**Sent:** Tuesday, May 31, 2022 3:04 PM  
**To:** Kittinger, Eric <Eric.Kittinger@meritenergy.com>  
**Subject:** RE: Circle Ridge Injection Well P&As

EXTERNAL EMAIL

Eric, you can submit the revised P&A plans to me. If the ONLY change in each plan is to reduce the amount of cement set immediately atop the CICR in each well then the revised P&A plans can be approved. Please do not adjust the steps in the P&A plans that place cement behind casing. There are two methods where the addition of cement behind casing is planned: (1) cement pumped through perforations added to the casing, and (2) using a surface-conveyed small-diameter pipe. See below for certain procedural steps in already-approved P&A plans, not to be removed.

**Wells placing cement behind casing through perforations to be added during P&A (Do not remove this step):**

- Shoshone 65-20 (cmt sqz perms to be added at 525')
- Shoshone 65-41 (cmt sqz perms to be added at 400')

**Wells placing cement behind casing using a small diameter tube inserted from surface (Do not remove this step):**

- Shoshone 65-38
- Shoshone 65-42
- Shoshone 65-77A
- Shoshone 65-68

Nathan Wiser, Underground Injection Control Program  
(he/his/him)

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For UIC program information, visit our webpage <https://www.epa.gov/uic/underground-injection-control-epa-region-8-co-mt-nd-sd-ut-and-wy>.

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**From:** Kittinger, Eric <[Eric.Kittinger@meritenergy.com](mailto:Eric.Kittinger@meritenergy.com)>

**Sent:** Tuesday, May 31, 2022 1:16 PM

**To:** Wiser, Nathan <[Wiser.Nathan@epa.gov](mailto:Wiser.Nathan@epa.gov)>

**Subject:** Circle Ridge Injection Well P&As

Mr. Wiser,

My engineer approached me about changing the P&A procedures for the Circle Ridge injection wells that Merit plans to plug this summer. He requests the following change.

Merit Energy Company previously submitted its plug and abandonment procedures for approval. Merit requests approval to change the cement on top of the cast-iron cement retainer to at least 50' above. The cement in the procedures show an excessive amount of cement above the required 50' on top of the CICR.

I will submit a sundry to the BLM because we want to change the procedure for all producing wells but want to see what your thoughts are before submitting the sundry since the injection wells can also be part of the sundry. If you agree with this change, what else do I need to submit to the EPA to make this official.

If you have any questions concerning this, don't hesitate to contact me directly.

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